

SHER TREMONTE LLP

May 10, 2016

**BY ECF**

The Honorable John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. David Schwartz, et al.*, 15 Cr. 835 (JGK)

Dear Judge Koeltl:

We write on behalf of our client, David Schwartz, with the consent of the government and counsel for all defendants to respectfully request an adjournment of the submission date for pretrial motions in the above-captioned matter until September 2016.

On April 27, 2016, the Court granted the undersigned's request to adjourn the trial date in this matter until January 2017. The Court adjourned all of the previously-scheduled dates, except for the due date for pretrial motions. That date remained the same, namely May 13, 2016. Our request for an adjournment of that date is based primarily on the government's recent production, on or about April 28, 2016, of approximately sixteen gigabytes of emails from Mr. Saez, who was recently indicted in this case. This new production, together with the government's production of approximately eight gigabytes of emails on April 7, 2016, is very substantial. Although it is not possible to make a precise estimate, the defense anticipates that it will take several months to review these materials. Accordingly, we respectfully request that the Court adjourn the due date for pretrial motions until September 2016.

This is the first request for an adjournment of the due date for pretrial motions in this matter. The government and counsel for all defendants consent to this request.

Respectfully submitted,



Michael Tremonte  
Valerie A. Gotlib

cc: All counsel of record (by ECF)